

**ICC Docket No. 14-0496**  
**Joint Applicants' Response to**  
**City of Chicago's Data Request 2.01-2.33**  
**Dated: September 12, 2014**

**REQUEST NO. 2.04:**

What does the phrase "net savings" mean, as it is used by the Joint Applicants' witnesses? (For example, compare JA Ex. 3.0 at 46:941 and JA Ex. 4.0 at 2:45-3:51.)

- a. If the meaning is not identical for each of the Joint Applicants' witnesses, provide each distinctive meaning of the term as it is used by a witness and identify each witness using each distinctive definition.
- b. As used by the Joint Applicants' witnesses, could "net savings" be negative, increasing the cost of service sought in rates?

**RESPONSE:**

- (a) The meaning of the term "net savings" as it is used by the Joint Applicants' witnesses is intended to be identical.
- (b) See Joint Applicants response to City data request 2.02 subpart (c).